

### **REMARKS**

Claims 1, 3-8 have been amended. Claim 2 and 9-12 have been canceled. Moreover, claims 13-19 are newly added in this application.

Support for amendment to claim 1 can be found in the original specification, including on page 7 of the specification. Specifically, the features of "forming one or more conductive plugs that penetrate the second insulating layer" and "the metallic light shield layers and the one or more transparent conductive layers are electrically connected" can be found on page 7, lines 7-13. Accordingly, the amendment adds no new matter to the application.

### **Rejections Under 35 U.S.C. 102(b) of Claims 1, 2, 7, and 8**

Claims 1-2 and 7-8 were rejected under 35 U.S.C. 102(b) as allegedly unpatentable over Park et al (USPN 5929949, hereinafter "Park"). Claim 1 is an independent claim, from which claims 2-8 depend. Applicant submits that claim 1 is patentable for at least the reasons discussed below, and therefore dependent claims 2-8 are patentable for at least the same reasons.

The Office Action alleges that "Park discloses the steps of claim 1 comprising performing a photolithography procedure using a photomask to form a plurality of longitudinally extending data lines and a plurality of metallic light shield layers on part of the first insulating layer without contacting source/drain electrode; forming a second insulating layer on the metallic light shield layers and the data lines; and forming one or more transparent conductive layers on part of the second insulating layer."

Independent claim 1, as amended, recites:

1. A method of fabricating an LCD device, comprising the steps of:
  - providing a substrate;
  - forming a plurality of transversely extending gate lines on the substrate;
  - forming a first insulating layer on the substrate and the gate lines;
  - performing a photolithography procedure using a photomask to form a plurality of longitudinally extending data lines and a plurality of metallic light shield layers on part of

the first insulating layer without contacting source/drain electrode, wherein the metallic light shield layers are located on both sides of the data line;

forming a second insulating layer on the metallic light shield layers and the data lines;

*forming one or more conductive plugs that penetrate the second insulating layer;*  
and

*forming one or more transparent conductive layers on part of the second insulating layer, so that the metallic light shield layers and the one or more transparent conductive layers are electrically connected.*

(Emphasis Added). Claim 1 patently defines over the cited art for at least the reason that the cited art fails to disclose the features emphasized above.

As expressly recited above, the claimed method of fabricating an LCD device expressly recites forming one or more conductive plugs that penetrate the second insulating layer and forming one or more transparent conductive layers on part of the second insulating layer, so that the metallic light shield layers and the one or more transparent conductive layers are electrically connected.

In contrast, Park discloses in column 7, lines 7-16, and FIG. 11(C)

... The light-shading films 41 and 42 are made of a conductive material and preferably overlap with the pixel electrode 50, between the guard film or the gate insulating film. ...

Referring to Park, the pixel electrode 50 is electrically connected to the drain electrode 22 through the contact holes C5 and C6, and to the light-shielding film 41 through the contact holes C1 and C2; however, referring to FIG. 11(C), the light-shading films 41 overlap with the pixel electrode 50, as stated in column 7, lines 10-12. In other words, pixel electrode 50 forms in the contact hole C5 and directly contacts the light-shielding film 41, as cited in Park. Therefore, it is clear that Park does not disclose forming one or more conductive plugs that penetrate the second insulating layer so that the metallic light shield layers and the one or more transparent conductive layers are electrically connected, as recited in claim 1. For at least this reason, amended claim 1 defines over the cited art and reconsideration of this rejection is hereby respectfully requested.

In view of the above reasons, the amended claim 1 is allowable over the cited reference (Park et al). Insofar as claims 2-8 depend from amended claim 1, these claims are also allowable by virtue of their dependency.

**Rejections Under 35 U.S.C. 103(a) of Claims 3-6 and 9-12**

Claims 3-6 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over Park in view of Teramoto et al (USPN 5,508,532, hereinafter "Teramoto"). However, insofar as claims 3-6 depend from claim 1, these claims are also allowable at least by virtue of their dependency.

Reconsideration of the above rejection over claims 3-6 is hereby respectfully requested.

**Newly Added Claims**

The applicant has reviewed the cited prior art references and believes that the new claims 13-19 are patentable over such references.

The features embodied in the newly added claims can be found on the embodiment of pages 5-7 in the application. Accordingly, no new matter is added to the application by these new claims.

**Conclusion**

For the reasons as described above, all pending claims are now in condition for allowance. Withdrawal of the rejections and allowance of all claims, as now amended, are respectfully requested. Applicant has made every effort to place the present application in condition for allowance. It is therefore earnestly requested that the present application, as a whole, receive favorable consideration and that all of the claims be allowed in their present form.

Should Examiner feel that further discussion of the application and the Amendment is conducive to prosecution and allowance thereof, please do not hesitate to contact the undersigned at the address and telephone listed below.

No fee is believed to be due in connection with this amendment and response to Office Action. If, however, any fee is believed to be due, you are hereby authorized to charge any such fee to deposit account No. 20-0778.

Respectfully submitted,

By:

  
Daniel R. McClure, Reg. No. 38,962

**Thomas, Kayden, Horstemeyer & Risley, LLP**  
100 Galleria Pkwy, NW  
Suite 1750  
Atlanta, GA 30339  
770-933-9500